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*Counsel for Plaintiff,
Ariel Abittan*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

ARIEL ABITTAN,

PLAINTIFF,

v.

LILY CHAO (A/K/A TIFFANY CHEN, A/K/A
YUTING CHEN), DAMIEN DING (A/K/A
DAMIEN LEUNG, A/K/A TAO DING),
TEMUJIN LABS INC. (A DELAWARE
CORPORATION), AND TEMUJIN LABS INC.
(A CAYMAN CORPORATION),

DEFENDANTS,

and

EIAN LABS INC.,

NOMINAL DEFENDANT.

Case No. 5:20-CV-09340-NC

Judge: Nathanael Cousins

DECLARATION OF ARIEL ABITTAN

I, Ariel Abittan, declare as follows:

1. I am over the age of 18, reside in New York, am competent to testify, and give this declaration based on my personal knowledge.

2. In 2016, I met Damien Ding on The Rolex Forums and began discussing high-end luxury watches. Shortly thereafter, Ding introduced me to a woman named Tiffany Chen a/k/a Lily Chao, who Ding said was his wife.

3. Ding, Chao, and I began transacting in high-end watches on a regular basis in 2016 and over the next three years, we founded additional businesses, including Eian Labs Inc., f/k/a Porepsus Labs Inc, which in turn developed blockchain technology known as Findora.

4. Over the course of our partnership, I flew from New York to visit Ding and Chao numerous times so that we could conduct business in person. Between January 2018 and July 2019, I flew to Atherton very frequently, and sometimes multiple times a month.

5. Until our relationship soured in 2020, Ding and Chao always invited me to their home, 69 Isabella Avenue, Atherton, CA, 94027 ("69 Isabella Ave."). On approximately twenty (20) separate occasions, I spent the night at 69 Isabella Ave., and sometimes brought my wife and children.

6. Each time I visited, Ding and Chao were present at their home, which they shared with their two young children; Chao's sister, Selena Chen; and their long-time driver, Jianrong Wang. Ding and Chao's children attended Sacred Hearts Schools, Atherton, located just one mile from 69 Isabella Ave.

7. At all times, Ding and Chao held 69 Isabella Ave. out as their primary residence, always referring to it as their house.

1 8. Attached as Exhibit 1 is a true and correct copy of a text message from January 15,
2 2018, showing the following conversation between me and Chao:

3 Chao: can you take uber to my house?thanks. [sic]

4 Abittan: Of Course! No worries.

5 Chao: Thanks.

6 Abittan: Address?

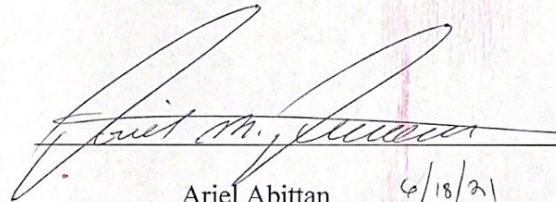
7 Chao: You don't know? 69 Isabella Ave, atherton [sic]

8 9. I attended several company barbeques at 69 Isabella Ave. hosted by Ding and Chao.

9 10. I observed that Chao sent packages to her home at 69 Isabella Ave.

10 11. Ding and Chao received, and responded to, mail delivered to 69 Isabella Ave. In
11 2017, my brother invited Ding and Chao to his wedding by mailing an invitation to 69 Isabella Ave.
12 Ding and Chao received the invitation and later attended the wedding.

13 12. I declare under penalty of perjury that the foregoing is true and correct. Executed on
14 June 18, 2021 at Lawrence, New York.

15 
16 Ariel Abittan 6/18/21